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4 CLERK U.S. DISTRICT COURT  
5 WESTERN DISTRICT OF WASHINGTON  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Edward Starks and Terrye Starks

Plaintiff(s),

v.  
The Cove Apartments  
and  
Carol Key

Defendant(s).

CASE NO. 23-cv-1493-RAJ  
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial:  Yes  No

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Edward Starks and Terrye Starks
Street Address	1909 104th Avenue E Unit Y207
City and County	Edgewood Pierce
State and Zip Code	WA 98372
Telephone Number	(206) 349-6279

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1 B. Defendant(s)

2 *Provide the information below for each defendant named in the complaint, whether the*  
3 *defendant is an individual, a government agency, an organization, or a corporation. For an*  
4 *individual defendant, include the person's job or title (if known). Attach additional pages if*  
5 *needed.*

6 Defendant No. 1

7 Name	The Cove Apartments
8 Job or Title ( <i>if known</i> )	
9 Street Address	33131 First Avenue SW
10 City and County	Federal Way King
11 State and Zip Code	WA 98023
12 Telephone Number	(253) 838-7867

13 Defendant No. 2

14 Name	Carol Key
15 Job or Title ( <i>if known</i> )	Landlord
16 Street Address	33131 First Avenue SW
17 City and County	Federal Way King
18 State and Zip Code	WA 98023
19 Telephone Number	(253) 838-7867

20 Defendant No. 3

21 Name	
22 Job or Title ( <i>if known</i> )	
23 Street Address	
24 City and County	
25 State and Zip Code	
26 Telephone Number	

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2 Defendant No. 4

3 Name \_\_\_\_\_

4 Job or Title (*if known*) \_\_\_\_\_

5 Street Address \_\_\_\_\_

6 City and County \_\_\_\_\_

7 State and Zip Code \_\_\_\_\_

8 Telephone Number \_\_\_\_\_

## II. BASIS FOR JURISDICTION

9 Federal courts are courts of limited jurisdiction (limited power). Generally, only two  
10 types of cases can be heard in federal court: cases involving a federal question and cases  
11 involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under  
12 the United States Constitution or federal laws or treaties is a federal question case. Under 28  
13 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and  
14 the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of  
15 citizenship case, no defendant may be a citizen of the same State as any plaintiff.

16 What is the basis for federal court jurisdiction? (*select all that apply*)

17  Federal question:  Diversity of citizenship:  
18 If checked complete section A. If checked complete section B.

19 Fill out the paragraphs in this section that apply to this case.

20 A. If the Basis for Jurisdiction Is a Federal Question

21 List the specific federal statutes, federal treaties, and/or provisions of the United States  
22 Constitution that are at issue in this case. *Attach additional pages if needed.*

23 Fraud and Misrepresentation:

24 Landlord made false statement with the intent on misrepresentation of fact.  
Done with financial displacement in mind, creating an eviction. Destroying  
plaintiff's rental history, credit history and lease renewal.

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1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (name) \_\_\_\_\_, is a citizen of the

5 State of (name) \_\_\_\_\_.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (name) \_\_\_\_\_, is incorporated under

8 the laws of the State of (name) \_\_\_\_\_, and has its principal

9 place of business in the State of (name) \_\_\_\_\_.

10 *(If more than one plaintiff is named in the complaint, attach an additional page providing  
the same information for each additional plaintiff.)*

11 2. The Defendant(s)

12 a. If the defendant is an individual.

13 The defendant, (name) \_\_\_\_\_, is a citizen of the

14 State of (name) \_\_\_\_\_. Or is a citizen of

15 (foreign nation) \_\_\_\_\_.

16 b. If the defendant is a corporation.

17 The defendant, (name) \_\_\_\_\_, is incorporated under

18 the laws of the State of (name) \_\_\_\_\_, and has its principal

19 place of business in the State of (name) \_\_\_\_\_.

20 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,

21 and has its principal place of business in (name) \_\_\_\_\_.

22 *(If more than one defendant is named in the complaint, attach an additional page  
providing the same information for each additional defendant.)*

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2 3. The Amount in Controversy.

4 The amount in controversy—the amount the plaintiff claims the defendant owes or the  
5 amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*)  
6 *Attach additional pages if needed:*

7  
8 III. STATEMENT OF CLAIM

9 Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as  
10 possible the facts showing that each plaintiff is entitled to the damages or other relief sought.  
11 State how each defendant was involved and what each defendant did that caused the plaintiff  
harm or violated the plaintiff's rights, including the dates and places of that involvement or  
conduct. If more than one claim is asserted, number each claim and write a short and plain  
12 statement of each claim in a separate paragraph. Attach additional pages if needed.

13 Landlord removed EPRAP funds issued on December 27, 2022 by Well Spring. Landlord  
14 created a false statement to do. Plaintiff has signed documents via Well Spring with email  
confirmation. Landlord's action leaves the plaintiff with an outstanding balance for rent with  
eviction notices. Plaintiff under threat of eviction moved causing expenses for movers and  
move in expenses. As a result of the activities at the Cove Apartment, Plaintiff lost income of  
about 2 years. Plaintiff's source of income was destroyed.

15 IV. RELIEF

16 State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do  
17 not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing  
18 at the present time. Include the amounts of any actual damages claimed for the acts alleged and  
the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts,  
19 and the reasons you claim you are entitled to actual or punitive money damages. Attach  
additional pages if needed.

20 Plaintiff ask the court to remove all debt incurred by landlord's actions and rental and  
credit history be returned as was. Plaintiff ask the court that all expenses incurred with  
moving be paid. Plaintiff ask the court to be paid for 3 years of mental haggling, lost of  
income source that still remains a lost. Never a chance to recover. And violation of  
21 plaintiff's rights. Plaintiff for 4 months was showing their rent was paid via  
portal transaction and Yes Management company. Landlord reversed it all.

22 V. CERTIFICATION AND CLOSING

23 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my  
24 knowledge, information, and belief that this complaint: (1) is not being presented for an improper

1 *Pro Se 1 2022*

1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
4 identified, will likely have evidentiary support after a reasonable opportunity for further  
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related  
8 papers may be served. I understand that my failure to keep a current address on file with the  
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing: September 25, 2023

11 Signature of Plaintiff Edward Starkes

12 Printed Name of Plaintiff Edward Starkes

14 Date of signing: September 25, 2023

15 Signature of Plaintiff Terrye Starks

16 Printed Name of Plaintiff Terrye Starks

18 Date of signing: \_\_\_\_\_

19 Signature of Plaintiff \_\_\_\_\_

20 Printed Name of Plaintiff \_\_\_\_\_

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